



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL ABRACZINSKAS
Director

September 3, 2020

Mary S. Walker, Regional Administrator
USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Subject: Source-Specific State Implementation Plan Revision for Sources of Sulfur Dioxide Included in Evergreen Packaging/Blue Ridge Paper Products, LLC, Title V Operating Permit (Permit No. 08961T29)

Dear Ms. Walker:

I am pleased to submit the final *Source-Specific State Implementation Plan for Evergreen Packaging/Blue Ridge Paper Products, LLC, Canton, Beaverdam Township, Haywood County, North Carolina for the 2010 1-Hour Sulfur Dioxide National Ambient Air Quality Standard (NAAQS)*. Enclosed is the complete package containing the proposed State Implementation Plan (SIP) revision uploaded into the United States Environmental Protection Agency's (EPA) State Planning Electronic Collaboration System (SPeCS) for SIPs interface for your staff to review and approve.

On October 9, 2017, the North Carolina Environmental Management Commission and Evergreen Packaging/Blue Ridge Paper Products, LLC (BRPP) entered into a Special Order by Consent (SOC 2017-002) to implement process modifications, upgrade existing control equipment, and install new control equipment to reduce sulfur dioxide (SO₂) emissions and keep associated ambient concentrations below the 2010 1-hour NAAQS. BRPP has complied with the SOC and, as a result, reduced its annual SO₂ emissions to 405 tons or by 93% (5,470 tons) from 2017 to 2019. These emission reductions have led to corresponding reductions in ambient SO₂ concentrations near the facility. The annual 99th percentile of the SO₂ 1-hour daily maximum concentrations measured by the ambient monitor near the facility decreased from a high of 213.4 parts per billion (ppb) (285% of the NAAQS) in 2018 to 34.8 ppb in 2019 (46% of the NAAQS). North Carolina is requesting EPA approve into the SIP, through parallel processing, the SO₂ emission limits and associated compliance parameters for specific emission units in BRPP's Title V operating permit (Permit No. 08961T29) to strengthen the SIP for complying with the 2010 1-hour SO₂ NAAQS in Beaverdam Township.



North Carolina Department of Environmental Quality | Division of Air Quality
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641
919.707.8400

As demonstrated through the State's Title V permitting process, modeling of the emission limitations included in the permit show attainment of the NAAQS, and the monitoring, recordkeeping, and reporting requirements included in the permit support compliance with the emission limitations. Once EPA approves this proposed SIP revision, the SO₂ emission limits and associated monitoring, recordkeeping, and reporting requirements will be permanent and federally enforceable under Section 110(a) of the Clean Air Act (CAA) to ensure that future ambient SO₂ concentrations in Beaverdam Township will remain below the NAAQS.

The EPA's September 5, 2019, guidance to states for developing recommendations for designating all remaining areas for the 2010 SO₂ NAAQS provides an option to develop a source-specific SIP for a facility like BRPP to serve as a basis for designating an area "Attainment/Unclassifiable." Therefore, the Division of Air Quality (DAQ) is also submitting this source-specific SIP for EPA's approval to not only strengthen the SIP for complying with the 1-hour SO₂ standard in Beaverdam Township, but also to qualify the Beaverdam Township area for an "Attainment/Unclassifiable" designation pursuant to EPA's 2019 designation guidance. The SIP also documents supplemental air quality modeling information the DAQ has previously submitted to EPA to support approval of North Carolina's CAA Section 110(a)(2)(D)(i)(I) "Good Neighbor" SIP for the SO₂ NAAQS.

The DAQ issued a public notice announcement, in accordance with 40 CFR 51.102, indicating that the *Source-Specific State Implementation Plan for Evergreen Packaging/Blue Ridge Paper Products, LLC, Canton, Beaverdam Township, Haywood County, North Carolina for the 2010 1-Hour Sulfur Dioxide National Ambient Air Quality Standard (NAAQS)* was available for public comment and posted on the DAQ website for review. The public comment period was open from Wednesday, June 24 through Monday, July 27, 2020.

In addition to posting on the website, the public notice announcement was sent to a number of email distribution lists managed by the DAQ, which includes numerous stakeholders from industry and environmental groups. The DAQ has found that sending the public notice announcements to these groups is more effective than publishing the notices in a few local newspapers and is consistent with the requirements described in the April 6, 2011, memorandum, *"Regional Consistency for the Administrative Requirements of the State Implementation Plan Submittals and the Use of Letter Notices."*

In order to address guidance to minimize the spread of COVID-19, the public notice indicated that a digital public hearing via Cisco's WebEx teleconferencing service would be scheduled if a public hearing were requested. The document was also made available for in person review during normal business hours at the DAQ Central Office in Raleigh and the DAQ Regional Office in Asheville.

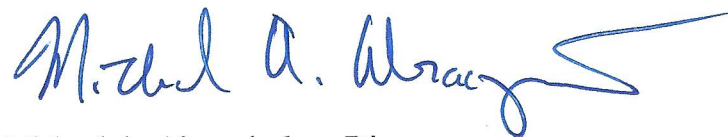
The DAQ did not receive any requests for a public hearing or any written comments from the public during the comment period.

Mary S. Walker
September 3, 2020
Page 3

I look forward to the EPA's review and final approval of the *Source-Specific State Implementation Plan for Evergreen Packaging/Blue Ridge Paper Products, LLC, Canton, Beaverdam Township, Haywood County, North Carolina for the 2010 1-Hour Sulfur Dioxide National Ambient Air Quality Standard (NAAQS)*.

If you should have any questions, please contact Randy Strait of my staff at (919) 707-8721 or randy.strait@ncdenr.gov.

Sincerely,

A handwritten signature in blue ink, reading "Michael A. Abraczinskas", with a stylized flourish at the end.

Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

MAA/rps

Enclosures

cc: Michael Pjetraj, DAQ
Brendan Davey, DAQ
Randy Strait, DAQ
Evan Adams, USEPA
Lynorae Benjamin, USEPA
Jane Spann, USEPA
Twunjala Bradley, USEPA